7		
2900 W. HOHZOH INGE FARWAY, SUITE 200, HELINGSOH, INEVAUA 6903	Telephone: (702) 451-2055 Facsimile: (702) 451-2077	

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

1	P. STERLING KERR, ESQ.
	Nevada Bar No. 3978
2	GEORGE E. ROBINSON, ESQ.
,	Nevada Bar No. 9667
3	DARWIN M. RYGG III, ESQ.
4	Nevada Bar No. 9173
.	KERR SIMPSON ATTORNEYS AT LAW
5	2900 W. Horizon Ridge Parkway, Suite 200
_	Henderson, Nevada 89052
6	Telephone No. (702) 451–2055
7	Facsimile No. (702) 451-2077
′	Email: sterling@kerrsimpsonlaw.com
8	Email: maury@kerrsimpsonlaw.com
_	Attorneys for Plaintiff
9	

UNITED STATES DISTRICT COURT DISTRICT OF NEVADA

INTERNATIONAL MARKETS LIVE, INC., a New York corporation dba iMARKETSLIVE;

Plaintiffs,

v.

AMANDA CUSTER, an individual D/B/A FOREX FOR WOMEN or FX FOR WOMEN; COLE CUSTER, an individual; JENN EUSTERWIEMANN, an individual; JOSHUA EUSTERWIEMANN, an individual; JEMMA WILSON, an individual; CHRISTIAN OERTEL, an individual; DOE 1-100 individuals; and ROE 1-10 entities.

Defendants.

Case No.: 2:23-cv-02151-JAD-BNW

STIPULATION AND [PROPOSED] ORDER TO EXTEND DISCOVERY DEADLINES

IT IS HEREBY STIPULATED between Plaintiffs INTERNATIONAL MARKETS LIVE, INC., by and through counsel, KERR SIMPSON ATTORNEYS AT LAW, and Defendants AMANDA CUSTER, COLE CUSTER, JENNIFER EUSTERWIEMANN, JOSHUA EUSTERWIEMANN, JEMMA WILSON, AND CHRISTIAN OERTEL (collectively, the "Defendants"), by and through their attorney of record, MCDONALD CARANO LLP, the discovery deadlines in this matter shall be extended as follows:

1. DISCOVERY COMPLETED TO DATE.

Case 2:23-cv-02151-JAD-BNW Document 18 Filed 07/11/24 Page 2 of 4

1

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

The	parties	filed	their	Stipulated	Discovery	Plan	and	Proposed	Scheduling	Order	oı
February 23	, 2024;										

Plaintiffs served their First Set of Interrogatories to Amanda Custer;

Plaintiffs served their First Set of Requests for Production of Documents to Amanda Custer;

Defendants served their First Set of Interrogatories to Plaintiff;

Defendants served their First Set of Requests for Production of Documents to Plaintiff;

Defendants served their Responses to First Set of Interrogatories to Amanda Custer;

Defendants served their Responses to First Set of Requests for Production of Documents to Amanda Custer;

Plaintiff noticed the Defendants' Depositions;

Defendants noticed the Deposition of the Plaintiff's Person Most Knowledgeable.

DISCOVERY THAT REMAINS TO BE COMPLETED 2.

The parties anticipate that the following discovery remains to be completed:

1. Depositions of Defendants and the Plaintiff's Person Most Knowledgeable;

REASON WHY DISCOVERY REMAINING NOT COMPLETED WITHIN THE 3. TIME SET BY THE DISCOVERY ORDER

The deponents were not available on the dates designated to appear. Therefore, the parties agreed to stipulate to extend discovery for the purposes of taking the depositions.

1 2

3

4

5

6

7

8

4. PROPOSED SCHEDULE FOR COMPLETING REMAINING DISCOVERY

Deadline	Current Date	Extended Date	
Close of Discovery	July 15, 2024	August 30, 2024	
Dispositive Motions	August 14, 2024	September 27, 2024	
Pre-Trial Order (inclusive of Pre-	September 13, 2024	October 31, 2024	
Trial Disclosures)			

9

10

Dated this 10th day of July, 2024

11

KERR SIMPSON ATTORNEYS AT LAW

12

13 14

15

16

17 18

19

20

21

2223

24

25

2627

28

Dated this 10th day of July, 2024

MCDONALD CARANO LLP

/s/ George E. Robinson

P. STERLING KERR, ESQ. Nevada Bar No. 3978

GEORGE E. ROBINSON, ESQ.

Nevada Bar No. 9667

DARWIN M. RYGG III ESQ.

Nevada Bar No. 9173

2900 W Horizon Ridge Pkwy, Suite 200

Henderson, Nevada 89052

Attorneys for Plaintiff

/s/ Karyna M. Armstrong

RYAN J. WORKS, ESQ Nevada Bar No. 9224 KARYNA M. ARMSTRONG Nevada Bar No. 16044 2300 W Sahara Ave, Suite 1200 Las Vegas, Nevada 89102 Attorneys for Defendants 2900 W. Horizon Ridge Parkway, Suite 200, Henderson, Nevada 89052 Telephone: (702) 451-2055 Facsimile: (702) 451-2077

1

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

27

28

ORDER

Based upon the forgoing stipulation of the parties,

IT IS HEREBY ORDERED, ADJUDGED AND DECREED that the discovery deadlines and schedule be extended as follows:

Close of Discovery	August 30, 2024
Dispositive Motions	September 27, 2024
Pre-Trial Order (inclusive of Pre-Trial	October 31, 2024
Disclosures)	

[] No new scheduling order will issue. [X] New scheduling order will be issued.

Dated this 11 day of July, 2024

Submitted by:

KERR SIMPSON ATTORNEYS AT LAW

/s/ George E. Robinson

P. STERLING KERR, ESQ.

Nevada Bar No. 3978 23

GEORGE E. ROBINSON, ESQ.

Nevada Bar No. 9667 24

DARWIN M. RYGG III ESQ.

Nevada Bar No. 9173 25

2900 W Horizon Ridge Pkwy, Suite 200

26 Henderson, Nevada 89052

Attorneys for Plaintiff